

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DONNA ESPOSITO, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

BLOCK, INC., JACK DORSEY, and  
AMRITA AHUJA,

Defendants.

Case No. 1:22-cv-08636-RA

**NOTICE OF NON-OPPOSITION OF LIGNO S. SANCHEZ TO  
COMPETING MOTIONS FOR APPOINTMENT AS LEAD PLAINTIFF  
AND APPROVAL OF COUNSEL**

Ligno S. Sanchez filed a timely motion appointment as lead plaintiff and approval of his selection of counsel. Dkt. No. 18. Four similar motions were filed by other putative class members in this action. Dkt. Nos. 21, 23, 27, 32.

The Private Securities Litigation Reform Act of 1995 (the “PSLRA”) provides a presumption that the “most adequate plaintiff” to represent the interests of class members is the person or group that, among other things, has “the largest financial interest in the relief sought by the class.” 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I). Having reviewed the competing motions and supporting papers provided by the other movants seeking appointment as lead plaintiff, it appears that Mr. Sanchez does not possess the “largest financial interest in the relief sought by the class” as required by the PSLRA. As such, Mr. Sanchez does not oppose the lead plaintiff motions of movants with larger financial interests.

However, if the Court determines that the lead plaintiff movants with financial interests larger than that of Mr. Sanchez are incapable or inadequate to represent the class in this litigation, Mr. Sanchez remains willing and able to serve as lead plaintiff or as a class representative. By this Notice of Non-Opposition, Mr. Sanchez does not waive his rights to participate and recover as a class member in this litigation.

Respectfully submitted,

DATED: December 27, 2022

**GLANCY PRONGAY & MURRAY LLP**

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*Counsel for Ligno S. Sanchez*

**PROOF OF SERVICE**

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On December 27, 2022, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 27, 2022, at New York, New York.

*/s/ Gregory B. Linkh*  
Gregory B. Linkh